

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 157, 545, 1643, 1690, 3353, 6153, 7315,  
14727, 16165, 23986, 24588 & 29125

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust, hereby certify as follows to the best of my knowledge, information and belief:

1. On November 23, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157] (the “Interim Order”).

2. On January 11, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Final Order”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

3. On June 15, 2023, the Court entered the *Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1643] (the “First Extension Order”).

4. On June 23, 2023, the Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company and The Financial Times Ltd (collectively, the “Media Intervenors”) filed a notice of appeal regarding the First Extension Order [D.I. 1690].

5. On October 24, 2023, the Court entered the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 3353] (the “Second Extension Order”).

6. On each of January 11, 2023, June 8, 2023, June 9, 2023 and October 24, 2023 (collectively, the “Prior Hearings”), the Court held an evidentiary hearing during which the Debtors and/or the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “Committee”), as applicable, presented evidence on which the Court relied to enter the Orders.

7. At the October 24, 2023 hearing, in connection with granting the Second Extension Order, the Court requested that the Debtors, the Committee, the United States Trustee for the District of Delaware (the “U.S. Trustee”) and the Media Intervenors (together with the FTX Recovery Trust, the “Parties”) find “some way to avoid another one of these hearings in 90 days where we don’t have to go through and hear the same testimony again.” (Oct. 24, 2023 Hr’g Tr. 59:16-18).

8. On January 22, 2024, the Debtors filed the *Third Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 6153] (the “Third Extension”).

Motion”), seeking entry of the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers*.

9. On February 13, 2024, the Court entered the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 7315] (the “Third Extension Order”).

10. On May 13, 2024, the Debtors filed the *Fourth Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 14727] (the “Fourth Extension Motion”), seeking entry of the *Fourth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers*.

11. On May 30, 2024, the Court entered the *Fourth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 16165] (the “Fourth Extension Order”).

12. On August 28, 2024, the Debtors filed the *Fifth Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 23986] (the “Fifth Extension Motion”), seeking entry of the *Fifth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers*.

13. On September 12, 2024, the Court entered the *Fifth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 24588] (the “Fifth Extension Order” and, together with the Interim Order, Final Order, First Extension Order, Second Extension Order, Third Extension Order and Fourth Extension Order, the “Orders”).

14. On January 3, 2025, the Debtors filed the *Motion of the Debtors for an Order Authorizing the Continued Redaction or Withholding of Confidential Information of Customers* [D.I. 29125] (the “Sixth Extension Motion”), seeking entry of the *Order Authorizing the Continued Redaction or Withholding of Certain Confidential Information of Customers*.

15. On January 3, 2025, the Debtors’ chapter 11 plan of reorganization became effective [D.I. 29127], which, among other things, established the FTX Recovery Trust and transferred, assigned, and vested all of the Debtors’ assets in the FTX Recovery Trust.

16. The Sixth Extension Motion is scheduled for a hearing on January 23, 2025.

17. The U.S. Trustee and the Media Intervenors have advised they oppose the relief requested in the Sixth Extension Motion.

18. Consistent with the Court’s directive at the October 24, 2023 hearing, the Parties have engaged in good faith discussions and entered into the *Stipulation Regarding the Motion of the Debtors for an Order Authorizing the Continued Redaction or Withholding of Confidential Information of Customers* (the “Stipulation”), a copy of which is attached hereto as Exhibit A, which provides, among other things, that “the Parties agree that the Court may rule on the Sixth Extension Motion based on the existing record of the Prior Hearings and the pleadings filed to date.” Stipulation, ¶1.

19. Except as otherwise set forth in the Stipulation, the FTX Recovery Trust has not received any other responses to the relief requested in the Sixth Extension Motion.

20. A copy of the proposed form of order submitted with the Sixth Extension Motion is attached hereto as Exhibit B (the “Sixth Extension Proposed Order”).

21. In accordance with the Court's electronic order processing procedures, copies of the Sixth Extension Proposed Order and the order approving the Stipulation (the "Stipulated Order") shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully requests the Sixth Extension Proposed Order and the Stipulated Order be entered at the Court's earliest convenience.

Dated: January 17, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

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